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February 22, 2012

VIA ECF

Hon. Jose L. Linares, U.S.D.J.
U.S. District Court- N.J.
50 Walnut Street
Newark, NJ 07102

Re.: U.S. v. Jovany Clermont
Docket No.: 11cr768(JLL)

Dear Judge Linares:

Please be advised that this office represents the above referenced defendant. An Order was entered by your Honor which requires defense motions to be filed by February 24, 2012.

I do intend on filing motions one of which is a Title III Motion to Suppress Intercepted Wire Transmissions. I just received the affidavits request the authorization to intercept the calls on February 21, 2012.

Thus, I am requesting an additional week to March 2, 2012 to file my motions and thereby extending the Government's time to respond to March 16, 2012.

I have the consent of my adversary AUSA Michael Robertson. Thank you for your anticipated concern and cooperation.

Respectfully,



Anthony C. Mack, Esq.

cc: Michael Robertson, AUSA (via ECF)

SO ORDERED:

DATED:



2/23/12